

Exhibit A

Preparation of Reply Brief

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
11/05/2018	RJS	1.00	Review and analysis of Opposition to Motion for Attorneys' Fees; conference regarding same
11/05/2018	SF	2.00	Review and analysis of Opposition to Motion for Attorneys' Fees; begin drafting Reply in support of Motion for Attorneys' Fees; legal research regarding same
11/06/2018	SF	5.75	Continue drafting Reply in support of Motion for Attorneys' Fees; legal research regarding same
11/07/2018	RJS	0.75	Conferences regarding Reply in support of Motion for Attorneys' Fees
11/07/2018	SF	5.25	Continue drafting Reply in support of Motion for Attorneys' Fees; legal research regarding same; conference regarding same
11/08/2018	SF	5.75	Continue drafting Reply in support of Motion for Attorneys' Fees; legal research regarding same; draft supplemental declaration in support of same; conference regarding same
11/09/2018	RJS	4.50	Review and revise Reply and supplemental declaration in support of Motion for Attorneys' Fees; conferences regarding same; email correspondence regarding same
11/09/2018	SF	2.00	Review and revise Reply and supplemental declaration in support of Motion for Attorneys' Fees; conference regarding same
11/11/2018	CH	2.00	Review and revise Reply and supplemental declaration in support of Motion for Attorneys' Fees
11/12/2018	RJS	3.75	Review and revise Reply in support of Motion for Attorneys' Fees; conferences regarding same
11/12/2018	SF	3.75	Review and revise Reply and supplemental declaration in support of Motion for Attorneys' Fees; conferences regarding same; draft evidentiary objections to declaration in support of Opposition to Motion for Attorneys' Fees

Totals		36.50
	CH	2.00
	RJS	10.00
	SF	24.50
Totals		36.50

Preparation for and Attendance at Hearing

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
11/15/2018	SF	2.75	Preparation for hearing on Motion for Attorneys' Fees
11/16/2018	SF	3.75	Preparation for hearing on Motion for Attorneys' Fees
11/19/2018	SF	1.75	Preparation for hearing on Motion for Attorneys' Fees; legal research regarding same
11/27/2018	RJS	2.25	Preparation for hearing on Motion for Attorneys' Fees; prepare updated summary of fees and billing records in support of same; conferences regarding same
11/27/2018	SF	0.50	Preparation for hearing on Motion for Attorneys' Fees
11/28/2018	SF	4.50	Continue preparing updated summary of fees and billing records in support of Motion for Attorneys' Fees; preparation for hearing on same
11/29/2018	RJS	2.50	Draft Second Supplemental Declaration of C. Harder in Support of Motion for Attorneys' Fees; review and revise updated summary of fees and billing records in support of same
11/29/2018	SF	0.25	Legal Research regarding Proposed Judgement; conference regarding same
11/30/2018	SF	0.50	Review and revise Second Supplemental Declaration of C. Harder in Support of Motion for Attorneys' Fees
12/2/2018	SF	1.75	Legal Research in support of Hearing on Motion for Attorneys' Fees; email correspondence regarding same
12/2/2018	CH	3.00	Preparation for hearing on Motion for Attorneys' Fees; email correspondence regarding same; review and revise Second Supplemental Declaration of C. Harder
12/3/2018	RJS	0.50	Draft Proposed Judgement
12/3/2018	SF	2	Review and revise Second Supplemental Declaration of C. Harder in Support of Motion for Attorneys' Fees and updated summary of fees and billing records; draft Notice of Lodgment
12/3/2018	CH	3.00	Preparation for hearing on Motion for Attorneys' Fees; review and revise Second Supplemental Declaration of C. Harder in support of same; conferences regarding same
12/3/2018	RJS	3.00	Attend hearing on Motion for Attorneys' Fees; round trip travel for same

12/3/2018	CH	3.00	Attend hearing on Motion for Attorneys' Fees; round trip travel for same
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Totals		35.00
	CH	9
	RJS	8.25
	SF	17.75
Totals		35.00

Totals for Reply Brief and Hearing

Category	Total Hours Per Category	Total Fees Per Category
Reply Brief	36.50	\$23,617.43
Hearing	35	\$24,226.18
Total	71.50	\$47,843.61

Attorney	Total Hours Per Attorney	Total Fees Per Attorney	Effective Hourly Rate Per Attorney
CH	11.00	\$9,258.04	\$841.64
RJS	18.25	\$13,805.94	\$756.49
SF	42.25	\$24,779.63	\$586.50
Total	71.50	\$47,843.61	

Total Fees Sought (Including Reply Brief and Hearing)

Category	Total Hours Per Category	Total Fees Per Category
Initial Strategy	47	\$34,707.97
Motion to Transfer	143.25	\$102,977.32
Motion to Strike	230.5	\$139,899.21
Motion for Fees	88.5	\$63,975.00
Reply Brief	36.50	\$23,617.43
Hearing	35	\$24,226.18
Total	580.75	\$389,403.11

Attorney	Total Hours Per Attorney	Total Fees Per Attorney	Effective Hourly Rate Per Attorney
CH	80.00	\$67,331.37	\$841.64
RJS	197.00	\$149,027.78	\$756.49
DE	125.25	\$76,651.34	\$611.99
SF	148.75	\$87,241.64	\$586.50
TN	29.75	\$9,150.98	\$307.60
Total	580.75	\$389,403.11	

Exhibit B

Home

Michael Avenatti

 @MichaelAvenatti

Follow

There has been a lot of misreporting about the money @StormyDaniels and I raised for her legal costs/expenses. See the real facts below. As you can see, we did not do this for the money. We did it because it was the right thing to do. And we will continue to do so.

#Basta

revenues

To date, our fundraising attempts have yielded **\$587,415** through the crowdjustice.org page.

Out-of-Pocket Expenses

The various legal matters in which we have served as counsel have required significant out-of-pocket expenditures on a consistent basis. These expenditures have included substantial amounts for security and outside professionals and service providers. *These out-of-pocket expenses through November 15 total \$637,434.18 and are summarized as follows:*

Court Reporter Fees	\$148.80
Court/Courier Fees	\$5,180.28
Misc.	\$104.99
Online Legal Research/Westlaw	\$9,181.00
Outside Legal Fees (Ohio & NY)	\$38,250.00
Outside Professional Fees (data and photocopies)	\$9,195.56
Rights to Videos/Files	\$125,000.00
Security	\$352,521.73
Travel - Air, Hotel, Ground Transportation, etc. (reduced from actual)	<u>\$97,851.82</u>
Total	<u>\$637,434.18</u>

Please note that unlike in many cases, we have not included any expenses for in-house photocopies (which have been extensive), word processing charges, etc., nor have we marked-up any out-of-pocket expenses as is done by many firms.

Hourly Fees

As of October 31, 2018, at least four attorneys have billed time to the various matters. Collectively, we have spent a total of over 2,381 billable hours. *At our standard hourly rates, this time equates to approximately \$1,638,390.* Importantly, these figures do not include any time spent on TV interviews or shows nor do they include any time spent responding to journalists seeking comment for various publications despite the fact that we believe much of this time benefited the legal efforts.

7:18 AM - 3 Dec 2018

186 Retweets

806 Likes

194

186

806

Olga Ives @Olgaco16 · 2h

Replying to @MichaelAvenatti @StormyDaniels

Thank you for the clarification, even though it wasn't necessary

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https://twitter.com/MichaelAvenatti/status/1069611810821627906

Update Re crowdjustice.org

Revenues

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In addition to the time above, we have also had no fewer than four staff members devoting time to your matters, including multiple legal secretaries and paralegals/legal assistants. *As a point of reference, through October 31, 2018, the lead paralegal working on the matters has spent over 691 hours, at a cost of \$134,745.*

Exhibit C

Stormy Daniels: Michael Avenatti Sued Trump For Defamation Against My Wishes

The porn star also says her lawyer refused to give her information about how her crowdfunding money was being spent, and launched a second crowdfund without her knowledge.

Betsy Woodruff, Kate Briquetelet 11.28.18 4:20 PM ET



EXCLUSIVE



Photo Illustration by The Daily Beast

Michael Avenatti sued Donald Trump for defaming Stormy Daniels against her wishes, Daniels told The Daily Beast in a statement on Wednesday.

Avenatti also started a new fundraising site to raise money for her legal defense fund without telling her, Daniels said. She said she is not sure whether or not she will keep Avenatti on as her lawyer.

Here is her full statement, provided to The Daily Beast:

"For months I've asked Michael Avenatti to give me accounting information about the fund my supporters so generously donated to for my safety and legal defense. He has repeatedly ignored those requests. Days ago I demanded again, repeatedly, that he tell me how the money was being spent and how much was left. Instead of answering me, without my permission or even my knowledge Michael launched another crowdfunding campaign to raise money on my behalf. I learned about it on Twitter.

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Avenatti Lived the High Life While Owing Millions to IRS

Kate Briquetelet



"I haven't decided yet what to do about legal representation moving forward. Michael has been a great advocate in many ways. I'm tremendously grateful to him for aggressively representing me in my fight to regain my voice. But in other ways Michael has not treated me with the respect and deference an attorney should show to a client. He has spoken on my behalf without my approval. He filed a defamation case against Donald Trump against my wishes. He repeatedly refused to tell me how my legal defense fund was being spent. Now he has launched a new crowdfunding campaign using my face and name without my permission and attributing words to me that I never wrote or said. I'm deeply grateful to my supporters and they deserve to know their money is being spent responsibly. I don't want to hurt Michael, but it's time to set the record straight. The truth has always been my greatest ally.

"My goal is the same as it has always been—to stand up for myself and take back my voice after being bullied and intimidated by President Trump and his minions. One way or another I'm going to continue in that fight, and I want everyone who has stood by me to know how profoundly grateful I am for their support."

"Michael launched another crowdfunding campaign to raise money on my behalf. I learned about it on Twitter."

— Stormy Daniels

The Daily Beast shared this statement with Avenatti. He provided the following statement:

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Avenatti and Stormy Daniels Launch Second Crowdfund



Avenatti Arrest Draws in Stormy Daniels and Jacob Wohl



Avenatti's Ex-Girlfriend Details Violent Alleged Assault

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"I am and have always been Stormy's biggest champion. I have personally sacrificed an enormous amount of money, time and energy toward assisting her because I believe in her. I have always been an open book with Stormy as to all aspects of her cases and she knows that. The retention agreement Stormy signed back in February provided that she would pay me \$100.00 and that any and all other monies raised via a legal fund would go toward my legal fees and costs. Instead, the vast majority of the money raised has gone toward her security expenses and similar other expenses. The most recent campaign was simply a refresh of the prior campaign, designed to help defray some of Stormy's expenses."

Stephen Gillers, a New York University Law School professor and expert on legal ethics, said Avenatti could face serious problems if he sued Trump against Daniels' wishes.

"If he filed the case with her name when it was clear that she told him not to, then he could be sued for that," Gillers said. "He could be sued for malpractice. If true, she has a malpractice case against him. I emphasize if true. And if true, he would be subject to discipline but not as serious as disbarment."

The [current CrowdJustice site](#) is one of just three fundraisers highlighted on CrowdJustice's homepage as of Wednesday afternoon. An earlier CrowdJustice site raised more than \$580,000 for Daniels' legal defense and no longer accepts contributions.

When The Daily Beast contacted Avenatti on Tuesday and asked about Daniels' two active Crowdjustice sites, the lawyer said, "We reset the page as the focus of the case changed from when we first launched the site." The Daily Beast also asked on Tuesday for a breakdown of expenses. In response, Avenatti said via email, "The money has gone toward the areas identified on the page. For instance, Stormy's security detail has cost hundreds of thousands of dollars, especially due to the high level of death threats. The other out-of-pocket costs of the litigation are also extraordinary (and I'm not speaking of attorneys' fees). Trump and Cohen have spent millions in their defense]."

Avenatti claimed at the time that he hasn't "received a dime in attorneys' fees"

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Avenatti claimed at the time that he hasn't "received a dime in attorneys' fees" from the crowdfunding effort. He said his firm has "spent well over a thousand hours of attorney time on the case at a value of over \$1,500,000 (and no, we do not count interviews or media as attorney time)."

Avenatti's legal work for Daniels hasn't always succeeded. In the April defamation lawsuit against the president, Avenatti argued Trump hurt her by tweeting that she participated in a "total con job." But in November, a judge dismissed the suit and ordered Daniels to pay the president's legal bills. Trump's lawyers asked for almost \$350,000 in legal fees; Daniels is now fighting to try to lower that bill.

Daniels and her lawyer have become household names since the revelation that Michael Cohen—then Trump's personal attorney—paid her hush-money during the presidential campaign. Daniels says she had an affair with Trump years before he ran for office (a claim Trump denies), and accepted \$130,000 from Cohen to stay quiet.

"It's time to set the record straight. The truth has always been my greatest ally."

— Stormy Daniels

Cohen admitted in court in August that he made illegal payments during the campaign at Trump's direction. He pleaded guilty to eight criminal counts and is awaiting sentencing.

Avenatti, meanwhile, has become a darling of the #Resistance, traveling to Iowa, raising money for Democratic candidates, and openly touting a potential 2020 presidential bid. But his White House dreams have faced major challenges; earlier this month, he was arrested under suspicion of domestic violence—allegations he roundly denies. And when he represented migrant children whom the Trump administration separated from their parents earlier this year, long-time immigration lawyers told The Observer he was "fantastically irresponsible."

And as The Daily Beast reported in October, court records reveal that the lawyer and his companies owed millions to the IRS in unpaid taxes and judgments.

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